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10 Marketing, Inc., Cerion GmbH, Crystal  
Capture, Inc., Vitro Laser Group USA, Inc.,  
11 Vitro Laser GmbH, and Meritage Graphics, Inc.

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 LASER DESIGN INTERNATIONAL, LLC; and | Lead Case No. C 03-01179 JSW  
16 NORWOOD OPERATING COMPANY, | Consolidated with No. C 03-03905 JSW  
17 Plaintiffs,  
18 v.  
19 BJ CRYSTAL, INC., et al.,  
Defendants.  
20 AND RELATED COUNTERCLAIMS

**STIPULATION AND [PROPOSED]  
ORDER RE MODIFICATION OF  
DEADLINES FOR LEDGER AND  
SUNMAN DEPOSITIONS**

**Honorable Jeffrey S. White**

21 Plaintiffs Laser Design International, LLC and Norwood Operating Company (“Plaintiffs”)  
22 and Defendants BJ Crystal, Inc., Crystal Magic, Inc., Jimac Marketing, Inc., Cerion GmbH, Crystal  
23 Capture, Inc., Vitro Laser Group USA, Inc., Vitro Laser GmbH, and Meritage Graphics, Inc.  
24 (“Defendants”) by their undersigned counsel hereby stipulate as follows:

25 1. On April 18, 2006, the Court ordered that Defendants may take the depositions of  
26 Dr. Neville Richard Ledger and Mr. Robert Peter Sunman, both inventors of the patent at issue,

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28 STIPULATION AND [PROPOSED] ORDER RE MODIFICATION OF  
DEADLINES FOR LEDGER AND SUNMAN DEPOSITIONS  
LEAD CASE NO. C 03-01179 JSW  
CONSOLIDATED WITH NO. C 03-03905 JSW  
PA061450.052

1 after the March 31, 2006 discovery cutoff. The Court further ordered that Defendants shall  
2 conduct those depositions by no later than May 26, 2006.

3       2. On May 17, 2006, the Court ordered that Defendants may amend their final  
4 invalidity contentions and that the discovery deadline is extended until August 18, 2006 for  
5 conducting discovery with respect to the newly-asserted items of prior art.

6       3. As of the date of this filing, the Senior Master of the Queen's Bench Division of the  
7 Supreme Court of England and Wales has not yet ruled on Defendants' request to take those  
8 depositions, which was submitted as a Letter of Request for International Judicial Assistance  
9 pursuant to the Hague Convention of March 18, 1970 on the Taking of Evidence Abroad in Civil  
10 or Commercial Matters.

11       4. In view of the extended discovery schedule and the fact that the Senior Master of  
12 the Queen's Bench Division has yet to issue an order on Defendants' Letter of Request, the  
13 undersigned hereby stipulate that Defendants may have until August 18, 2006 to complete the  
14 depositions of Dr. Neville Richard Ledger and Mr. Robert Peter Sunman.

15 Date: May 25, 2006.

**PERKINS COIE LLP**

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By: \_\_\_\_\_ /s/

Elizabeth Schwartz, OSB No. 96112  
Admitted *Pro Hac Vice*  
Attorneys for Defendants and  
Counterclaimants

Date: May 25, 2006.

**COOLEY GODWARD LLP**

By: \_\_\_\_\_ /s/

Brian E. Mitchell, State Bar No. 190095  
Attorneys for Plaintiffs  
Laser Design International, LLC  
and Norwood Operating Company

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2 Dated: May 30, 2006

3 By:   
HONORABLE JEFFREY S. WHITE  
United States District Judge

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28 STIPULATION AND [PROPOSED] ORDER RE MODIFICATION OF  
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